

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. Nos. 29193, 29194, 29195, 29544, 29545,  
29546, 29550, 29578, 29579, 29749, 29856 & 30064

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER GRANTING  
FINAL ALLOWANCE OF CERTAIN FEES AND EXPENSES  
FOR CERTAIN PROFESSIONALS**

I, Kimberly A. Brown, counsel to FTX Recovery Trust<sup>2</sup>, hereby certify as follows to the best of my knowledge, information and belief:

1. In accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435], entered January 9, 2023 (the “Interim Compensation Order”), the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834], entered March 8, 2023 (the “Fee Examiner Order”), the *Supplemental Order Expanding the Scope of the Fee Examiner’s Duties with Respect to Certain Professionals* [D.I. 28868], entered December 17, 2024, (the “Supplemental Fee Examiner Order”), and the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 26404], entered October 8, 2024, (the “Confirmation Order”), those professionals listed on

<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

**Exhibit 1** to the proposed form of omnibus order (the “Proposed Order”)<sup>3</sup> attached hereto as **Exhibit A** (each, an “Applicant” and collectively, the “Applicants”) filed their final fee applications [D.I. 29193, 29194, 29195, 29544, 29545, 29546, 29550, 29578, 29579, 29749 & 29856] (collectively, the “Uncontested Final Applications”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. Pursuant to the Final Applications (defined below), objections to each of the Final Applications, if any, were to be filed and served no later than the objection deadline set forth on each of the Final Applications in accordance with the Interim Compensation Order (as applicable, the “Objection Deadline”), the last of which expired on March 25, 2025. The Applicants received no objections or responses to the Uncontested Final Applications prior to the applicable Objection Deadline.

3. The hearing to consider approval of the following final applications and the objections thereto filed by Lidia Favario<sup>4</sup> are scheduled for April 17, 2025 at 2:00 p.m. (ET) (the “Hearing”): (i) the *Final Fee Application of Sullivan & Cromwell LLP* [D.I. 29197], (ii) the *Final Fee Application of Quinn Emanuel Urquhart & Sullivan, LLP for the Period From November 13, 2022, Through and Including October 8, 2024* [D.I. 29196], and (iii) the *Final Application of Eversheds Sutherland (US) LLP, as Lead Counsel for the Ad Hoc Committee of Non-US Customers of FTX.com, for Allowance of Compensation and Reimbursement of All*

<sup>3</sup> As stated in the Fee Examiner Report, the Fee Examiner and certain professionals, including Ernst & Young LLP, Perella Weinberg Partners LP, and Rothschild & Co US Inc., have agreed to defer consideration of their pending final applications [D.I. 29847, 27980, 28289, & 27969] (the “Deferred Final Applications”) to a future hearing date while discussions are ongoing. Accordingly, the Deferred Final Applications are not included on the Proposed Order attached hereto.

<sup>4</sup> Specifically, Ms. Favario filed the following objections: (i) the *Objection to Eversheds Sutherland’s Fee Application* [D.I. 29994], filed Mar. 26, 2025, (ii) the *Objection to the Final Fee Application of Sullivan & Cromwell LLP* [D.I. 29430], filed Jan. 29, 2025, and (iii) the *Objection to the Final Fee Application of Quinn Emanuel Urquhart & Sullivan, LLP for the Period From November 13, 2022, Through and Including October 8, 2024* [D.I. 29387], filed Jan. 24, 2025.

*Actual and Necessary Expenses for the Period from May 1, 2023, Through and Including October 8, 2024* [D.I. 29861] (collectively, the “Additional Final Applications” and together with the Uncontested Final Applications, the “Final Applications”). The FTX Recovery Trust will submit an appropriate order with respect to the Additional Final Applications following the Hearing.

4. Pursuant to the Fee Examiner Order, Katherine Stadler, (the “Fee Examiner”) filed the *Fee Examiner’s Summary Report on Final Fee Applications* [D.I. 30064] (the “Fee Examiner Report”) with respect to each of the Final Applications subject to review pursuant to the Fee Examiner Order and the Supplemental Fee Examiner Order, recommending the approval of the fees and expenses requested in each of the Final Applications with certain agreed upon reductions.<sup>5</sup>

5. Given the lack of outstanding objections to the approval of the Uncontested Final Applications, counsel to the FTX Recovery Trust prepared the Proposed Order approving the Uncontested Final Applications. A copy of the Proposed Order is attached hereto as **Exhibit A**.

6. The Proposed Order has been circulated to each Applicant, the U.S. Trustee, and the Official Committee of Unsecured Creditors (the “Committee”) appointed in these chapter 11 cases. Each Applicant, including the Fee Examiner, consents to entry of the Proposed Order, and the U.S. Trustee and the Committee have advised that they do not object to entry of the Proposed Order.

7. In accordance with the Court’s electronic order processing procedures, a clean copy of the Proposed Order shall be uploaded to CM/ECF.

---

<sup>5</sup> Pursuant to paragraph 3(iv) of the Fee Examiner Order and the Supplemental Fee Examiner Order, flat-fee professionals are subject to Fee Examiner review only with respect to requested expenses.

WHEREFORE the undersigned, on behalf of the FTX Recovery Trust, respectfully requests that the Proposed Order, substantially in the form attached hereto as **Exhibit A**, be entered at the Court's earliest convenience.

Dated: April 11, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Christian P. Jensen (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
jensenc@sullcrom.com

*Counsel to the FTX Recovery Trust*